

384-07/MEU

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

07 cv 6786 (PKL)

-----X
CHIQUITA INTERNATIONAL LIMITED and GREAT
WHITE FLEET LIMITED,

Plaintiffs,

-against-

**REPLY AFFIRMATION
OF
MICHAEL E. UNGER**

M/V BOSSE, her engines, boilers, tackle, furniture, apparel,
etc., *in rem*, BOSSE SHIPPING LTD., and HOLY HOUSE
SHIPPING AB *in personam*,

Defendants.
-----X

MICHAEL E. UNGER, affirms the following under penalty of perjury:

1. I am an attorney admitted to practice before this Court and am a partner in the law firm of Freehill, Hogan & Mahar, LLP, attorneys for Defendants Holy House and Bosse Shipping herein. I submit this Affirmation in further support of the instant motion to vacate the Rule B attachment of certain funds which have been restrained pursuant to the Order and Process of Maritime Attachment and Garnishment ("PMAG") issued in this action.

2. Attached hereto as Exhibit A are true and correct copies of printouts from the Holy House Shipping AB website.

3. Holy House's mailing address and fax number are readily available from its website.

Dated: New York, New York
September 17, 2007



MICHAEL E. UNGER

EXHIBIT A

Reply Affirmation of
Michael E. Unger



Holy House Shipping

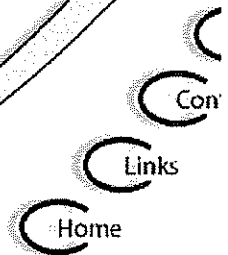
Holy House is a shipping company carrying out full technical and commercial management of refrigerated cargo ships of classical design.

The Holy House principal office is located in Stockholm, Sweden, where the company continues to excel in its field, privileged by its long experience in this Mecca of reefer shipping.

Some 800 sailors from more than twenty nations earn their living onboard the ships operated by Holy House Shipping, serving all traditional refrigerated trades.

For more than 30 years Holy House has had the pleasure of cooperating with all major traders and suppliers in the reefer industry.

Ship's Particulars ▼



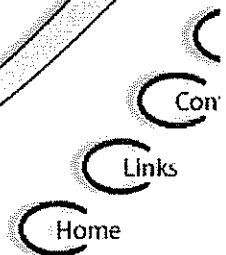


Contact Holy House

Holy House Shipping AB
Box 1150
S-111 81 Stockholm

Phone: +46-8-23 74 60
Fax: +46-8-791 50 39
E-mail: shipping@holyhouse.se

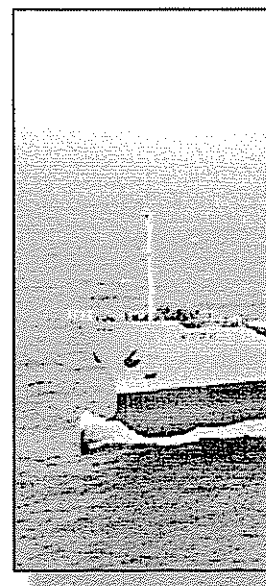
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Kungsgatan 55





M/V "Bosse" Description

Owner: Bosse Shipping Ltd
Flag: Barbados
Port of Registry: Bridgetown
Built: Japan 1984
Call Sign: 8PTO
Sat "C" No: 431 423 310
Total Cubic: 439,462 ft³
Deck Area: 4,909 m²
Class: ABS highest class
Number of Holds/Hatches/Compts: 4/4/15
 4 Side Ports each side
Cranes: 4 x 15 mt
Hatch Openings: 11.70 m x 7.50 m
Summer Deadweight: 9,321 on 8.67 m
L.O.A: 149.03 m
Breadth: 20.60 m
Depth: 13.00 m
International GRT/NRT: 9032/4268
Temperature Range: -25°C / +32°C



Cargo Holds	ft ³	m ²
<u>Hold 1 A-Deck</u>	26,093	221
Hold 1 B-Deck	12,887	147
Hold 1 C-Deck	11,316	141
Hold 1 Total	50,296	509
Hold 2 A-Deck	38,056	392
<u>Hold 2 B-Deck</u>	31,382	370
Hold 2 C-Deck	28,803	343
Hold 2 D-Deck	25,343	282
Hold 2 Total	123,584	1,387
Hold 3 A-Deck	36,421	385
<u>Hold 3 B-Deck</u>	32,355	391
Hold 3 C-Deck	32,084	390
Hold 3 D-Deck	31,756	370
Hold 3 Total	132,616	1,536

Hold 3 Total	132,010	1,330
Hold 4 A-Deck	38,858	414
<u>Hold 4 B-Deck</u>	34,751	417
Hold 4 C-Deck	32,861	378
Hold 4 D-Deck	26,496	268
Hold 4 Total	132,966	1,477
 GRAND TOTAL	 439,462	 4,909

Reefer Plant: R22 Direct Expansion

Air Circulation: 90/hour

Air Renewal: 1.4/hour


Wooden Gratings: Maximum load 5 tons

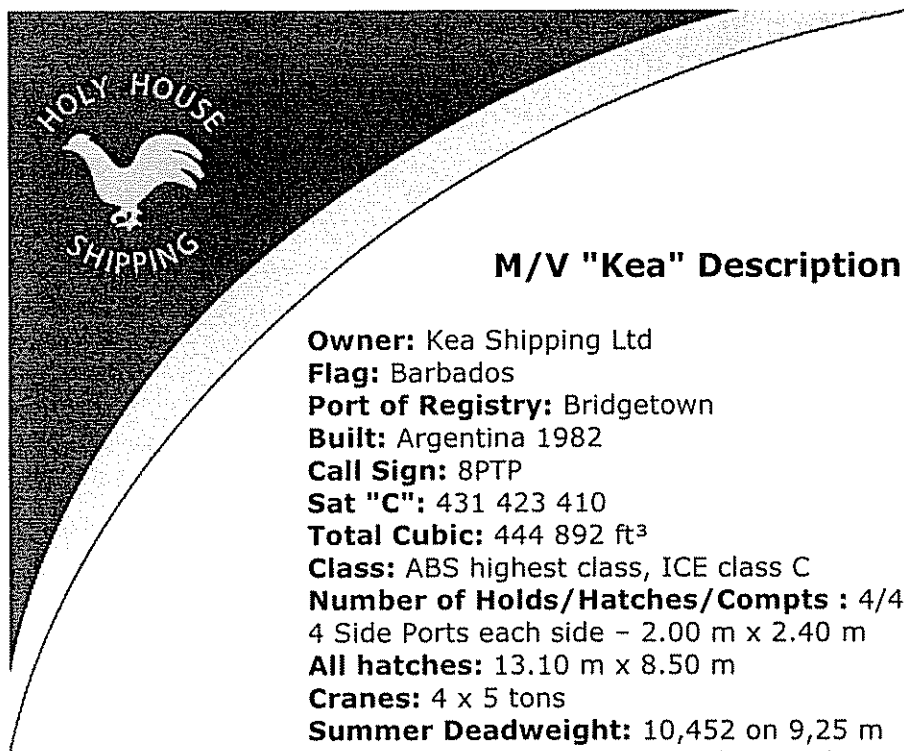
Forklifts to have 4 wheels with pneumatic tyres, one in each corner, with a max including cargo.

Reefer Containers: 30 plugs 12 FEU + 18 TEU
(Container Loading only after Masters/Owners approval)

Engine: Akasaka-Mitsubishi 7UECS52HA - 9600 HP @ 160 rpm

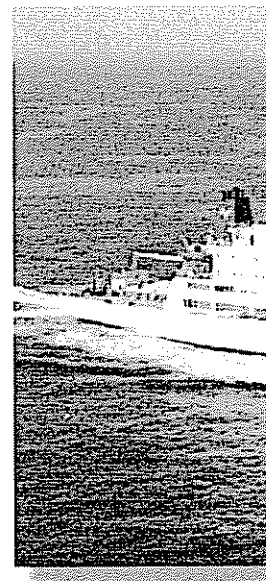
All figures given for guidance only and without guarantee.

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M/V "Kea" Description

Owner: Kea Shipping Ltd
Flag: Barbados
Port of Registry: Bridgetown
Built: Argentina 1982
Call Sign: 8PTP
Sat "C": 431 423 410
Total Cubic: 444 892 ft³
Class: ABS highest class, ICE class C
Number of Holds/Hatches/Compts : 4/4/14
 4 Side Ports each side - 2.00 m x 2.40 m
All hatches: 13.10 m x 8.50 m
Cranes: 4 x 5 tons
Summer Deadweight: 10,452 on 9,25 m
LOA/Beam/Depth: 146.5 m/21.0 m/13.0 m
GRT / NRT: 9 801 / 4 691
Temperature Range: -30°C / +15°C in 8 zones



Cargo Holds	ft ³	m ²
Hold 1 A-Deck	37,998	381.9
Hold 1 B-Deck	29,520	286.5
Hold 1 C-Deck	19,328	227.4
Hold 1 D-Deck	15,839	172.7
Hold 1 Total	102,685	1 068.5
Hold 2 A-Deck	42,145	420.2
Hold 2 B-Deck	32,112	399.4
Hold 2 C-Deck	29,767	362.8
Hold 2 D-Deck	26,034	295.6
Hold 2 Total	130,058	1,478.0
Hold 3 A-Deck	42,710	433.8
Hold 3 B-Deck	34,221	437.0
Hold 3 C-Deck	34,354	436.2
Hold 3 D-Deck	34,387	423.6
Hold 3 Total	145,672	1,730.6

Hold 4 A-Deck	41,011	405.7
Hold 4 B-Deck	25,466	282.2
Hold 4 Total	66,477	687.9

GRAND TOTAL 444,892 4,965.0

Reefer Plant: R22 Brine

Air Circulation: 90/hour

Air Renewals: Between 1.83 and 4.45/hour

Wooden Gratings: Warkaus type- Maximum load 5 tons

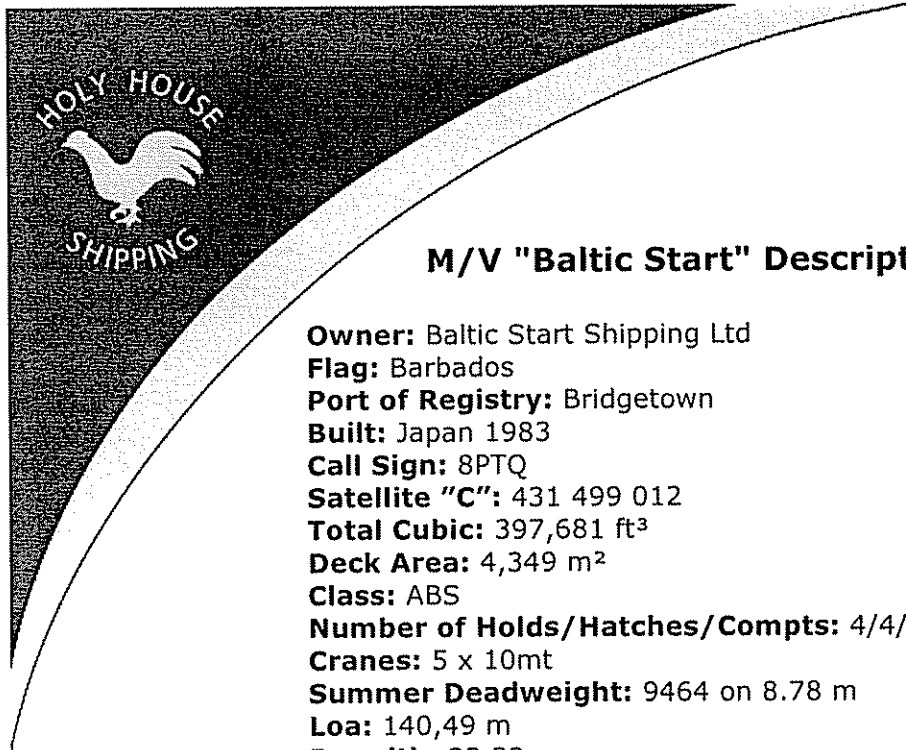
Forklift to have 4 wheels with pneumatic tyres, one in each corner, with a max. load including cargo.

Engine: SULZER 7 RND 68 M - 13330 BHP

All figures given for guidance only and without guarantee.



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M/V "Baltic Start" Description

Owner: Baltic Start Shipping Ltd
Flag: Barbados
Port of Registry: Bridgetown
Built: Japan 1983
Call Sign: 8PTQ
Satellite "C": 431 499 012
Total Cubic: 397,681 ft³
Deck Area: 4,349 m²
Class: ABS
Number of Holds/Hatches/Compts: 4/4/14
Cranes: 5 x 10mt
Summer Deadweight: 9464 on 8.78 m
Loa: 140,49 m
Breadth: 22.22 m
Depth: 13.00 m
GRT/NRT: 9628/3664

Cargo Holds	ft ³	m ²	Hatches
<u>Hold 1 A-Deck</u>	27,227	254	10.80m x 9.40m
Hold 1 B-Deck	18,293	201	
Hold 1 C-Deck	15,080	175	
Hold 1 Total	60,600	630	
Hold 2 A-Deck	36,233	374	11.60m x 9.40m
<u>Hold 2 B-Deck</u>	32,101	367	
Hold 2 C-Deck	29,523	344	
Hold 2 D-Deck	25,921	289	
Hold 2 Total	123,778	1,374	
Hold 3 A-Deck	37,540	393	11.60m x 9.40m
<u>Hold 3 B-Deck</u>	33,125	400	
Hold 3 C-Deck	33,479	404	
Hold 3 D-Deck	33,020	390	
Hold 3 Total	137,164	1,587	

Hold 3 Total	137,107	1,387	
<u>Hold 4 A-Deck</u>	37,611	392	10.80m x 9.40m
Hold 4 B-Deck	26,274	242	
Hold 4 C-Deck	12,254	124	
Hold 4 Total	76,139	758	
 GRAND TOTAL	 397,681	 4,349	

Reefer Plant: R22 Direct Expansion

Air Circulations: 90/hour

Air Renewals: 3/hour

Bunker Capacity: 1,270 mt IFO 380 and 370 mt MDO 18 TEU on deck


Tween-Deck Max Load: 1.54 mt/m²

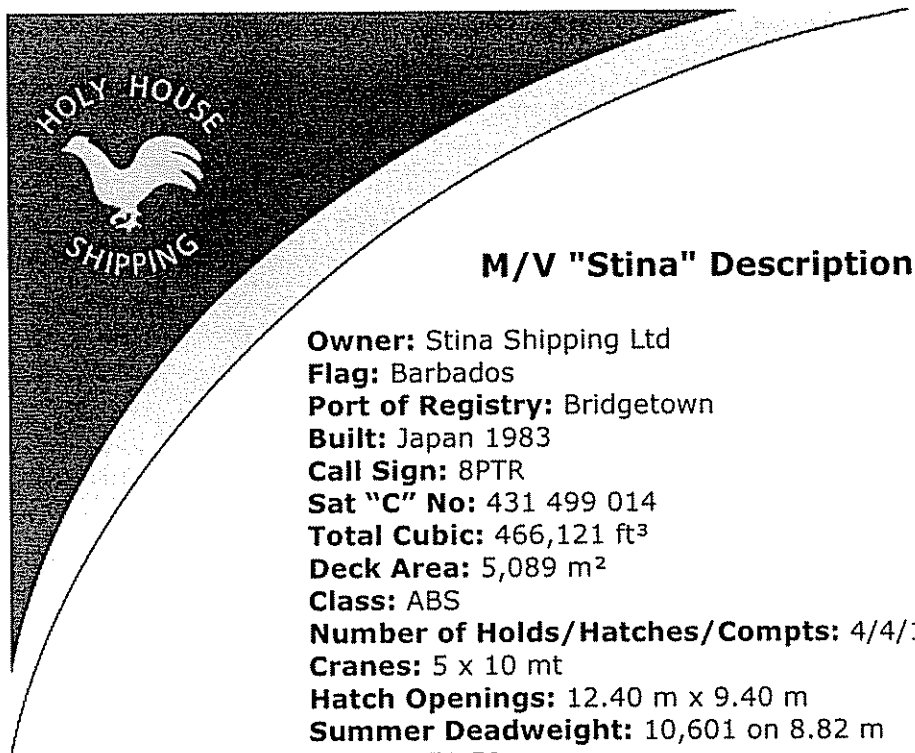
Wooden Gratings: Maximum load 5 tons

Forklift to have 4 wheels with pneumatic tyres, one in each corner, with a max including cargo.

Engine: UBE – MHI 7UEC 60HA - 9120 kW

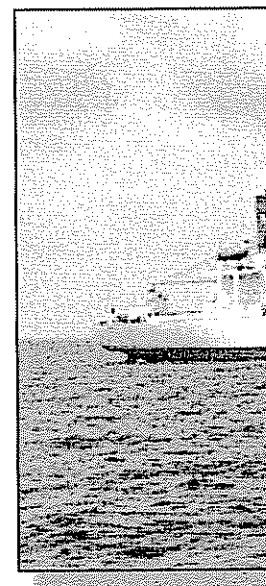
All figures given for guidance only and without guarantee.

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M/V "Stina" Description

Owner: Stina Shipping Ltd
Flag: Barbados
Port of Registry: Bridgetown
Built: Japan 1983
Call Sign: 8PTR
Sat "C" No: 431 499 014
Total Cubic: 466,121 ft³
Deck Area: 5,089 m²
Class: ABS
Number of Holds/Hatches/Compts: 4/4/14
Cranes: 5 x 10 mt
Hatch Openings: 12.40 m x 9.40 m
Summer Deadweight: 10,601 on 8.82 m
L.O.A: 151.50 m
Breadth: 22.80 m
Depth: 13.10 m
International GRT/NRT: 10535/4212



Cargo Holds	ft ³	m ²
<u>Hold 1 A-Deck</u>	33,938	304
Hold 1 B-Deck	21,436	236
Hold 1 C-Deck	17,516	205
Hold 1 Total	72,890	745
Hold 2 A-Deck	46,792	477
<u>Hold 2 B-Deck</u>	40,471	463
Hold 2 C-Deck	37,151	439
Hold 2 D-Deck	33,761	387
Hold 2 Total	158,175	1,766
Hold 3 A-Deck	44,355	461
<u>Hold 3 B-Deck</u>	38,281	464
Hold 3 C-Deck	38,564	466
Hold 3 D-Deck	38,458	448
Hold 3 Total	159,658	1,839

Hold 4 A-Deck	37,999	367
Hold 4 B-Deck	24,050	233
Hold 4 C-Deck	13,349	139
Hold 4 Total	75,398	739
 GRAND TOTAL	 466,121	 5,089

Reefer Plant: R22 Direct Expansion

Air Circulation: 90/hour

Air Renewals: 3/hour

Bunker Capacity: 1,500 mt IFO 380 and 300 mt MDO

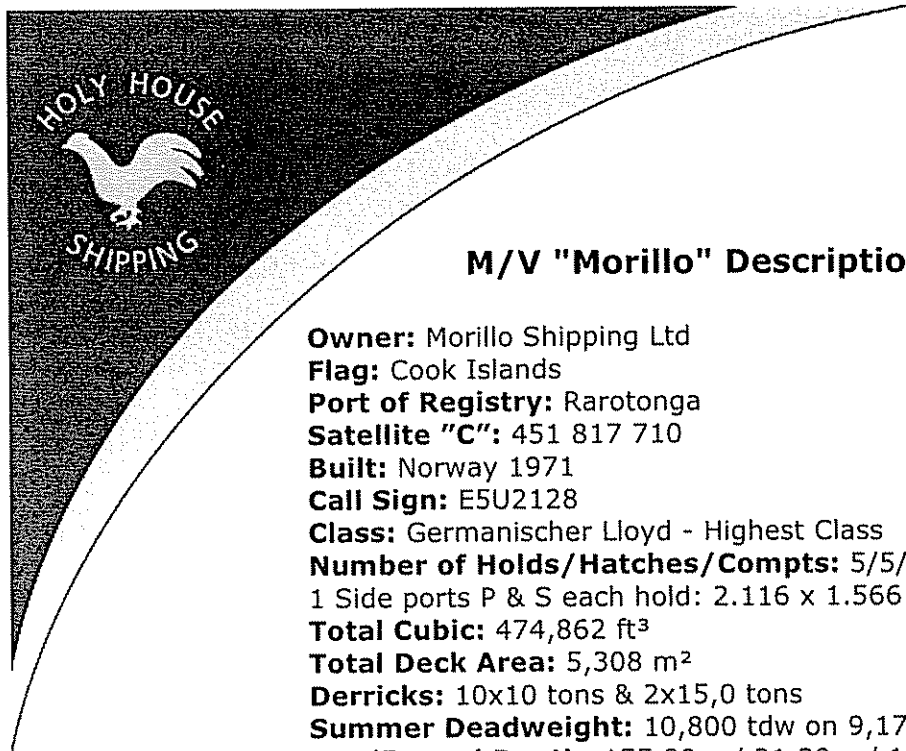
Wooden Gratings: Maximum load 5 tons

Forklifts to have 4 wheels with pneumatic tyres, one in each corner, with a max load including cargo.

Engine: UBE – MHI 8UEC 60HA - 10591 kW

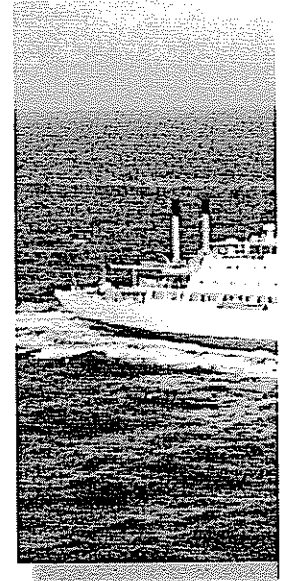
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M/V "Morillo" Description

Owner: Morillo Shipping Ltd
Flag: Cook Islands
Port of Registry: Rarotonga
Satellite "C": 451 817 710
Built: Norway 1971
Call Sign: E5U2128
Class: Germanischer Lloyd - Highest Class
Number of Holds/Hatches/Compts: 5/5/19,
 1 Side ports P & S each hold: 2.116 x 1.566 m
Total Cubic: 474,862 ft³
Total Deck Area: 5,308 m²
Derricks: 10x10 tons & 2x15,0 tons
Summer Deadweight: 10,800 tdw on 9,175m
Loa/Beam/ Depth: 155.80m / 21.30m / 12.70m
GRT/NRT: 9,983/5,217
Temperature Range: -25°C / +15°C in 8 zones



Cargo Holds	ft ³	m ²	Hatches
Hold 1 A-Deck	22,937	192	7,525m x 7,000m
Hold 1 B-Deck	12,510	122	
Hold 1 C-Deck	8,819	99	
Hold 1 D-Deck	7,577	61	
Hold 1 Total	51,843	474	
Hold 2 A-Deck	38,967	385	10,490m x 7,000m
<u>Hold 2 B-Deck</u>	28,540	331	
Hold 2 C-Deck	25,560	308	
Hold 2 D-Deck	22,658	275	
Hold 2 Total	115,725	1,299	
Hold 3 A-Deck	36,708	364	10,490m x 7,000m (29,504 ft ³ with no side shor
<u>Hold 3 B-Deck</u>	26,336	321	
Hold 3 C-Deck	29,352	363	
Hold 3 D-Deck	28,092	343	
Hold 3 Total	120,488	1,391	

Hold 4 A-Deck	36,293	372	10,490m x 7,000m
<u>Hold 4 B-Deck</u>	23,555	306	(29,432 ft ³ with noside shori
Hold 4 C-Deck	30,197	373	
Hold 4 D-Deck	28,226	327	
Hold 4 Total	118,271	1,378	
Hold 5 A-Deck	33,347	303	9,740m x 7,000m
Hold 5 B-Deck	17,102	175	
Hold 5 C-Deck	9,041	85	
Hold 5 Total	59,490	563	
GRAND TOTAL	465,817	5,105	
With no shoring up	474,862	5,308	

Reefer Plant: R22 Brine System

Air Circulation: 90/hour

Air Renewals: 3/hour


Wooden Gratings: Warkaus type- Maximum load 5 tons

Forklifts to have 4 wheels with pneumatic tyres, one in each corner, , with a n including cargo.

Engine: B&W 9K74EF - 17,400 BHP

Bunker Capacity: 1,877 mts HFO, 523 mts MDO

All figures given for guidance only and without guarantee.

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M/V "Tasman Start" Description

Owner: Tasman Start Shipping Ltd
Flag: Barbados
Port of Registry: Bridgetown
Built: Japan 1983
Call Sign: 8PTE
Satellite "C": 431 422 310
Total Cubic: 397,082 ft³
Deck Area: 4,339 m²
Class: ABS
Number of Holds/Hatches/Compts: 4/4/14
Cranes: 5 x 10m
Loa: 140,49 m
Breadth: 22.22 m
Depth: 13.00 m
GRT/NRT: 9632/3664
Summer Deadweight: 9464 on 8.78 m

Cargo Holds	ft ³	m ²	Hatches
<u>Hold 1 A-Deck</u>	27,122	254	10.80m x 9.40m
Hold 1 B-Deck	18,293	201	
Hold 1 C-Deck	15,080	175	
Hold 1 Total	60,495	630	
<u>Hold 2 A-Deck</u>	36,198	374	11.60m x 9.40m
<u>Hold 2 B-Deck</u>	32,066	366	
Hold 2 C-Deck	29,488	343	
Hold 2 D-Deck	25,851	289	
Hold 2 Total	123,603	1,372	
<u>Hold 3 A-Deck</u>	37,328	392	11.60m x 9.40m
<u>Hold 3 B-Deck</u>	33,090	399	
Hold 3 C-Deck	33,514	403	
Hold 3 D-Deck	32,914	389	
Hold 3 Total	136,846	1,583	

Hold 3 Total	130,840	1,389	
<u>Hold 4 A-Deck</u>	37,610	389	10.80m x 9.40m
Hold 4 B-Deck	26,274	241	
Hold 4 C-Deck	12,254	124	
Hold 4 Total	76,138	754	
 GRAND TOTAL	 397,082	 4,339	

Reefer Plant: R22 Direct Expansion

Air Circulation: 90/hour

Air Renewals: 3/hour


Bunker Capacity: 1,270 mt IFO 380 and 370 mt MDO – 18 TEU on deck

Wooden Gratings: Maximum load 5 tons

Forklift to have 4 wheels with pneumatic tyres, one in each corner, with a max including cargo.

Engine: UBE – MHI 7UEC 60HA - 9120 kW

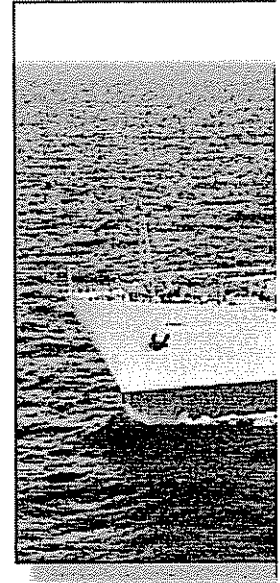
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M/V "Cherry" Description

Owner: Cherry Shipping Ltd
Flag: Cook Islands
Port of Registry: Rarotonga
Satellite "C": 451 818 310
Built: Norway 1971
Call Sign: E5U2134
Total Cubic Capacity: 473,498 ft³
Class: Germanischer Lloyd - Highest Class
Number of Holds/Hatches/Compts: 5/5/19,
 1 Side ports P & S each hold: 2.116 x 1.566 m
Total Deck Area: 5,308 m²
Derricks: 10x10 tons & 2x15,0 tons
Summer Deadweight: 10,800 tdw on 9,175m
Loa/Beam/Depth: 155.80m/21.30m/12.70m
GRT/NRT: 9,983/5,217
Temperature Range: -25°C / +15°C in 8 zones



Cargo Holds	ft ³	m ²	Hatches
Hold 1 A-Deck	22,887	192	7,525m x 7,000m
Hold 1 B-Deck	12,387	122	
Hold 1 C-Deck	8,681	99	
Hold 1 D-Deck	7,872	61	
Hold 1 Total	51,827	474	
Hold 2 A-Deck	38,963	385	10,490m x 7,000m
<u>Hold 2 B-Deck</u>	27,858	331	
Hold 2 C-Deck	25,115	308	
Hold 2 D-Deck	22,658	275	
Hold 2 Total	114,594	1,299	
Hold 3 A-Deck	36,391	364	10,490m x 7,000m (30,046 ft ³ with no side sh
<u>Hold 3 B-Deck</u>	26,262	321	
Hold 3 C-Deck	29,278	363	
Hold 3 D-Deck	28,092	343	
Hold 3 Total	120,023	1,391	

Hold 3 Total	120,845	1,371	
Hold 4 A-Deck	36,138	372	10,490m x 7,000r
Hold 4 B-Deck	23,713	306	(29,905 ft ³ with no side st
Hold 4 C-Deck	29,588	373	
Hold 4 D-Deck	28,226	327	
Hold 4 Total	117,665	1,378	
Hold 5 A-Deck	33,270	303	9,740m x 7,000m
Hold 5 B-Deck	17,102	175	
Hold 5 C-Deck	9,041	85	
Hold 5 Total	59,413	563	
GRAND TOTAL	463,522	5 105	
With no shoring up	473,498	5,308	

Reefer Plant: R22 Brine System

Air Circulations: 90/hour

Air Renewals: 3/hour


Wooden Gratings: Warkaus type- Maximum load 5 tons

Forklift to have 4 wheels with pneumatic tyres, one in each corner, with a max including cargo.

Engine: B&W - 17,400 BHP

Bunker Capacity: 1,840 mts HFO, 450 mts MDO

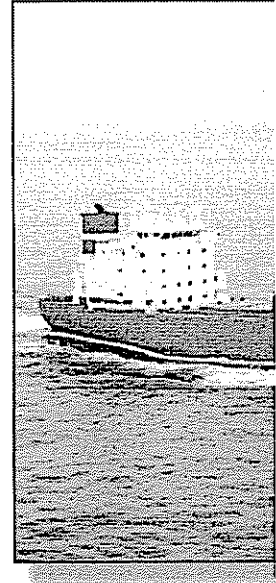
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M/V "Lapponian" Description

Owner: Pink Fox (Cayman) Ltd
Flag: Cook Islands
Port of Registry: Rarotonga
Built: Norway 1992
Call Sign: ESU2135
Satellite "C": 431 952 610
Class: LR + 100 A1 LMC RMC UMS LNC AA
Cubic Capacity: 415,810 ft³
Deck area: 4776m²
GRT/NRT: 7,944/4,632
DWT @ MTS: 11 095 @ 9.60 m
Loa/Beam/Depth: 140.50 m / 19.70 m / 13.00 m
Number of Holds/Hatches/Compts: 4/4/15
Cranes: 2 x 8 tonnes + 2 x 36 tonnes
 42 Reefer Plugs
 Equipped with sideboards
Containers:
 On Deck/Hatches – 96 TEU, alt 42 FEU + 12 TEU
 In Holds – 108 TEU, alt 54 FEU
 Total – 204 TEU, alt 96 FEU + 12 TEU



Cargo Holds	ft ³	m ²	Hatches
<u>Hold 1 A-Deck</u>	36,410	394	12.60 x 5.40 m
Hold 1 B-Deck	27,016	299	
Hold 1 C-Deck	21,789	226	
Hold 1 Total	85,215	919	
<u>Hold 2 A-Deck</u>	31,960	340	12.60 x 10.00 m
Hold 2 B-Deck	27,051	332	
Hold 2 C-Deck	27,828	312	
Hold 2 D-Deck	23,661	258	
Hold 2 Total	110,500	1,242	
<u>Hold 3 A-Deck</u>	32,243	344	12.60 x 10.00 m
Hold 3 B-Deck	27,828	344	
Hold 3 C-Deck	29,735	343	
Hold 3 D-Deck	20,452	224	

Hold 3 D-Deck	23,433	334	
Hold 3 Total	119,258	1,365	
Hold 4 A-Deck	37,504	411	12.60 x 10.00 m
Hold 4 B-Deck	27,369	340	
Hold 4 C-Deck	27,863	314	
Hold 4 D-Deck	16,598	185	
Hold 4 Total	109,334	1,250	
GRAND TOTAL	424,307	4,776	

Air Circulation per Hour: 90 – Vertical Ventilation No Side Ports


Aluminium Gratings: Maximum load 5 tons.

Forklifts to have 4 wheels with pneumatic tyres, 1 in each corner, with a max including cargo.

Cooling Sections: 1 A, 1 BCD, 2 A, 2 BCD, 3A, 3BCD, 4 A, 4BCD,

Vessel equipped with Bow-Thruster Vessel equipped with Shaft Genera

All figures given for guidance only and without guarantee.

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